MIOSHA	**DIVISION INSTRUCTION**
Construction Safety and Health Division (CSHD) Michigan Occupational Safety and Health Administration (MIOSHA) Department of Labor and Economic Opportunity (LEO)	
DOCUMENT IDENTIFIER: CSHD-COM-09-1R4	DATE: November 12, 2020
SUBJECT: Construction Inspection Targeting	

I. Purpose. This instruction establishes the Michigan Occupational Safety and Health Administration (MIOSHA), Construction Safety and Health Division (CSHD) programmed inspection targeting plan for the construction industry.

II. Scope. This instruction applies to MIOSHA CSHD field enforcement operations.

III. Reference. MIOSHA Strategic Plan for FY 2019-2023, Emphasis 1.3 and 1.4.

IV. Distribution. MIOSHA Staff; Federal OSHA; S-drive Accessible; MIOSHA Messenger; and Internet Accessible.

V. Next Review Date. This instruction will be reviewed three years from date of issuance.

VI. Cancellations. All previous versions of this division instruction.

VII. History. History of previous versions include:

CSHD-COM-09-1R3, June 15, 2016.
CSHD-COM-09-1R2, September 14, 2015.
CSHD-COM-09-1R1, October 30, 2012.
CSHD-COM-09-1, October 5, 2009.

VIII. Contact. Lawrence Hidalgo, Jr., Director

IX. Originator. Lawrence Hidalgo, Jr., Director

X. Significant Changes.

A. Updated reference to current MIOSHA Strategic Plan.

B. Updated procedure for processing Dodge reports.

C. Added Appendix A and Appendix B.

XI. Background.

A. Because of the mobility of the construction industry, the transitory nature of construction worksites, and the fact that construction worksites frequently involve more than one construction employer, inspections are scheduled from a list of construction worksites rather than construction employers.

B. The current system for scheduling random inspections in the construction industry uses national data on anticipated or active construction projects from F.W. Dodge and selects projects for inspection using a model developed by the University of Tennessee and currently administered by the federal OSHA Office of Statistical Analysis.

C. MIOSHA CSHD receives a monthly list of inspection targets from an OSHA contractor (currently the Eastern Research Group) that are selected at random by the model.

D. The list is designed to provide timely information on known active construction projects, including the project's location and the name of the owners, project managers, and contractors working on the projects.

E. Specifically identified hazards or a narrow range of construction activities are addressed by other MIOSHA targeting systems like state emphasis programs or special initiatives (e.g., Fall Prevention – State Emphasis Program, MIOSHA-COM-17-2, as amended).

F. The CSHD construction inspection targeting plan also relies on building permits. SOs/IHs may stop at state and local governmental agencies that issue building permits and request to see/obtain a copy of their building permits list. The SOs/IHs should select those projects for inspecting that do not appear on the Dodge report. Enter into OIS optional report code S-521.

XII. Dodge Database.

A. Dodge Report Coordinator (DRC).

1. The DRC will assign all users, including field staff, support staff, supervisors, and managers, with a username and password. See Appendix A.

2. Each month, the DRC will provide field staff an update to the Dodge database and/or send out an Excel spreadsheet to field staff. See Appendix B for the procedure.

B. Field Staff.

1. The Dodge database can be used either when connected to the S-drive (central application) or on field staff computers (local application). The local application will allow the user to look at a three-month window of any new or open projects downloaded to their computer for the entire state without being connected to the S-drive. The SO/IH may opt to use the Excel sheet solely.

2. The database search function allows staff to search by address, optional reporting number, and/or Dodge report number. The use of asterisks before and after a street name/partial street name or address will return all records with the specified information in the entire state. This information can be further narrowed by looking through the records manually on either the local application or the central application when connected to the S-drive.

3. Field staff should access the S-drive at least once each month and download (refresh each month) the Dodge reports to their computers when notified by the DRC. Inspection activity that is generated by a Dodge report will be assigned an optional reporting number by the Dodge

database when the OSHA Information System (OIS) information is inputted. The SO/IH may opt to use the Excel sheet solely.

4. Field staff will search the jobsite address for each inspection in the Dodge database or Excel sheet provided, prior to submitting in OIS to ascertain if a Dodge Report number has been assigned. If found in the search, the Dodge report number will be entered in OIS as state code S-518.

5. Safety field staff should inspect a minimum of two Dodge report projects in their area each month. The corresponding Dodge report number will be entered in OIS as state code S-518.

6. Since Dodge reports drop off the area lists every three months, field staff must copy/save a particular Dodge report project that they may want for a future inspection (e.g., larger projects they may not be able to inspect right away).

7. Any inspection conducted outside of an assigned work area will be documented as its original work area. The out-of-area safety officer/industrial hygienist (SO/IH) will inform the SO/IH from the assigned area that an inspection was conducted in their area. This may be done via email or phone call.

C. Support Staff.

1. Support staff will add information from OIS to the Dodge database.

2. The search function in the database allows administrative staff to search by address, optional reporting number and/or Dodge report number. The use of asterisks before and after a street name/partial street name or address will return all records with the specified information in the entire state. This information can be further narrowed by looking through the records manually.

3. Administrative staff will enter the information on either the "Add" screen for all new inspections or the "Edit" screen for existing inspection reports and any uninspected Dodge report numbers.

D. Supervisors.

1. Supervisors will monitor the area lists and field inspection activity each month, as needed.

2. Supervisors may assign a minimum of two Dodge report projects for inspection to each field staff each month, as appropriate.

3. Supervisors are responsible for monitoring field staff for complying with this instruction.

4. The search function with the database allows supervisors to search by address, optional reporting number, and/or Dodge report number. The use of asterisks before and after a street name/partial street name or address will return all records with the specified information in the entire state.

This information can be further narrowed by looking through the records manually. The supervisor may opt to use the monthly Excel sheet solely.

XIII.   Strategic Plan Targeting Inspections and Imminent Danger Situations.

A.   SOs/IHs in CSHD can conduct on-site inspections based on identifying construction projects in assigned areas and based on the SO/IH identifying construction projects that are viewed while traveling in their work areas. This type of inspection is referred to as a strategic plan targeting inspection. SOs/IHs should review construction activity in their assigned area list to identify a project for a potential strategic plan targeting inspection. If the project is not on their assigned area list, the project will be added for inspection. It is at the discretion of the SO/IH as to when the inspection will be conducted. An optional reporting number will be generated when entered into the Dodge database.

B.   SOs/IHs, as appropriate, are expected to stop and conduct an inspection when potential "imminent danger" conditions are viewed. Such conditions include but are not limited to:

1.   Employees working at heights where there is a high probability of a fall resulting in death or serious injuries.

2.   Employees working in trenches greater than five feet deep, where there is a high probability of cave-in and there are no protective systems in place to prevent a cave-in.

3.   Employees working with cranes, boom trucks, aerial lift platforms or other equipment in close proximity to overhead power lines.

4.   Employees working on roadway projects where the lack of traffic control may result in an immediate hazard.

5.   Employees working at projects where there is a potential for excessive exposure to lead, silica, noise, asbestos, hexavalent chromium, or isocyanate containing compounds.

6.   Other conditions are to be discussed with the SO/IH's immediate supervisor.

7.   Staff have discretion to address other situations where observed hazards may result in a high gravity, serious violative conditions.

XIV.   Programmed Inspections using Building Permits.

A.   SOs/IHs may also obtain a list of active construction projects from state and local governmental agencies that issue building permits while performing other work-related activities.

B.   SOs/IHs are encouraged to and may stop at state and local governmental agencies that issue building permits and request to see/obtain a copy of their building permits list. The SOs/IHs should select those projects for inspecting that do not appear on the Dodge report.

C.   Enter in OIS optional report code S-521.

XV.   Programmed Inspections of Asbestos Projects.

    A.   Background. Asbestos abatement, encapsulation and demolition projects are construction activities that are continually being conducted in Michigan. Asbestos is often found in thermal system insulation, surfacing material, wallboard, floor tile, roofing and siding materials, and construction mastics. Construction activities involving these materials have the potential to liberate asbestos fibers. Asbestos exposure has been associated with asbestosis, lung cancer and mesothelioma. By targeting employers who perform asbestos-related construction work, CSHD can reduce and/or eliminate exposure to this carcinogen.

    B.   Targeting. Contractors performing friable asbestos removal or encapsulation work in Michigan must provide project notifications ten calendar days prior to any non-emergency asbestos project. Emergency notices may be submitted at any time. The notifications must indicate the start and end dates and other job-related information. CSHD evaluates the notices for the purpose of inspection scheduling. CSHD will attempt to inspect 50% of all new asbestos licensees who are performing work in Michigan during the first year of obtaining their license. CSHD will attempt to inspect 50% of the asbestos licensees who are performing work in Michigan at least once every three years. Inspections will be scheduled based upon the best utilization of resources.

    C.   Re-inspection Program. Only licensed asbestos abatement contractors will be selected for re-inspections. A licensed asbestos abatement contractor is a business entity that is licensed under the asbestos abatement contractors licensing act (Act 135 of the Public Acts of 1986, as amended). Re-inspections have the highest priority of all the different types of programmed inspections. A licensed asbestos abatement contractor will be placed on the re-inspection list if the contractor was issued six or more serious violations during any inspection. CSHD will wait at least six months from the case closure date before listing the contractor. Submission of notification of correction or payment of penalty does not preclude the contractor from being placed on the re-inspection list. A re-inspection should be completed within one year of listing unless the licensed asbestos abatement contractor is not active. The industrial hygiene supervisor will check each year after the contractor is listed to see if the contractor renewed its asbestos abatement license. The industrial hygiene supervisor will remove a contractor from the re-inspection list if the contractor is no longer licensed. Otherwise, a licensed asbestos abatement contractor will remain on the list until re-inspected. A licensed asbestos abatement contractor will continue to be re-inspected until it no longer meets the re-inspection criteria. CSHD will not re-inspect a licensed asbestos abatement contractor on the re-inspection list, and the contractor will be removed from the re-inspection list if the contractor is inspected because of a complaint, referral, or other unprogrammed activity, and the complaint/referral/unprogrammed inspection results in five or fewer serious violations. The industrial hygiene supervisor will assign and track re-inspections. The supervisor will develop and provide re-inspection program updates with the CSHD quarterly inspection data reports.

Appendix A

How to Add Staff/Reset Passwords in the Dodge Database

1. Log into the Dodge Database. It can be found here: S:\bsrconsf\DodgeDB. Click on the Dodge Central Icon.
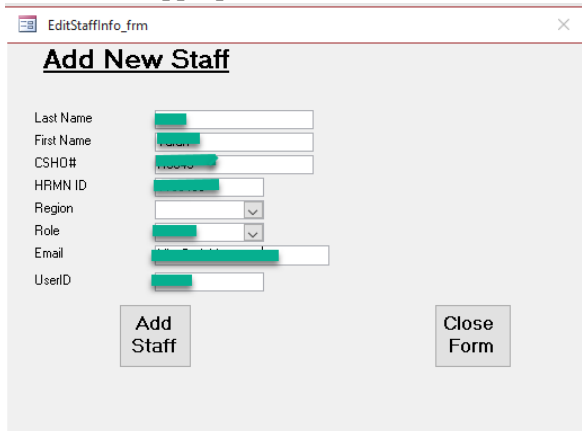

2. Login using your user ID and password.

3. After logging in, you will be placed at the Administrative Main Menu. Click on Tools Menu.
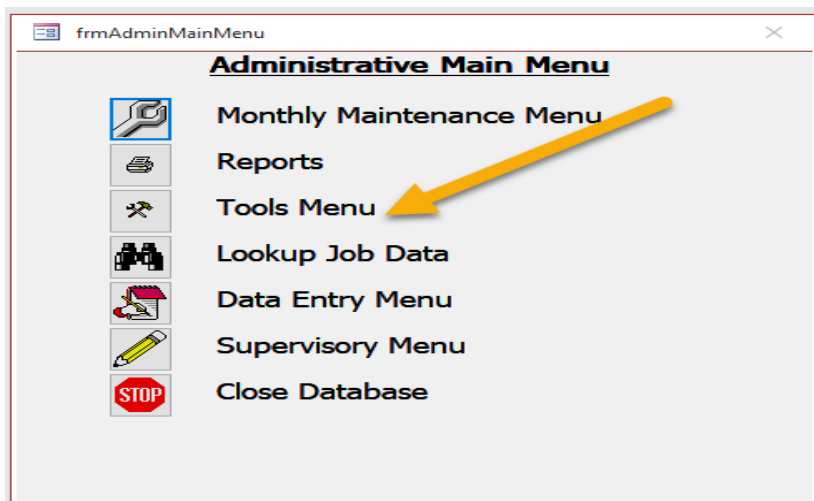
4. You will now be in a Menu called Administrative Tools, click on Add New Staff.
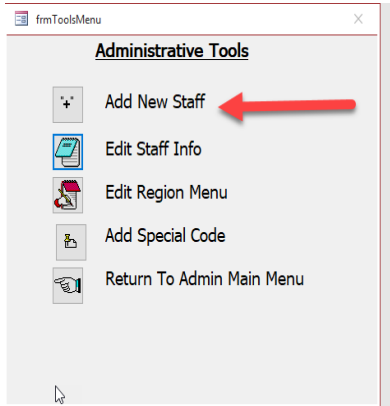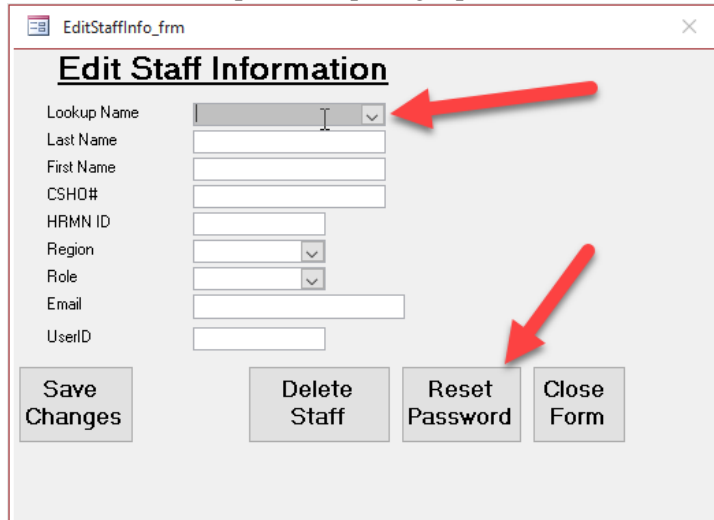

5. Enter in the appropriate data in the fields listed below in green for the person being added.

6. Click Add staff. A box will pop up and say Record Saved. Click OK. Then another box will pop up and ask if you would like to add another staff member. Choose Yes or No. When you select No, it will put you back at the Administrative Tools Menu (Step #4). This has not fully created the account yet. You must now setup a password for whomever you just created an account for. Click on Edit Staff info.
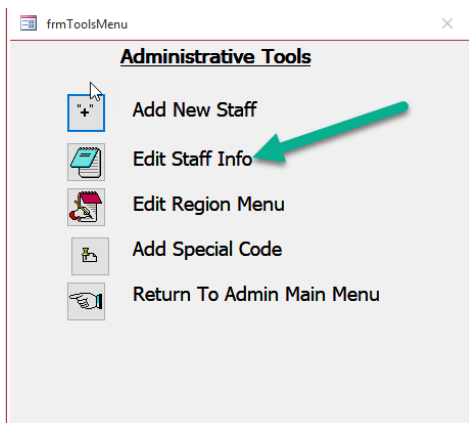
7. You will now be in a box that is labeled Edit Staff Information. Use the Lookup name function to quickly access the appropriate person. Verify that the person you had just added is in the database. Once you select the person, their data should automatically populate in the fields below. Click on Reset Password. This will automatically send an email from the persons email who clicked reset to the person requiring a password.

8. Go to your email and verify that the email sent. Now the person can use the Dodge Database.
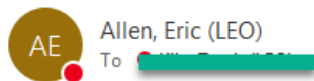
Appendix B

Procedure for Dodge Reports

1. Receive email from John Carrol or other representatives providing the list. Example below.

Note: See how the "zip" drive folder is wrong. This is intentional due to it being an access file (size).

2. Save the attachment to your desktop
3. Rename the file to ".zip" instead of "_zip"
4. Open the file.
5. Extract the file to your desktop. Leave it as an Access file for now.
6. Open the Access file
7. Double click the left-hand column where it states "LoadSites". It will then open the file up and the right-hand side (ID, DR Num, etc.) will expand.

8. Right click the "LoadSites" box on the left (see above for reference). A chart will open up. Hover over Export, then select Excel.
9. A box will pop-up. Follow the steps below to export. Select OK.
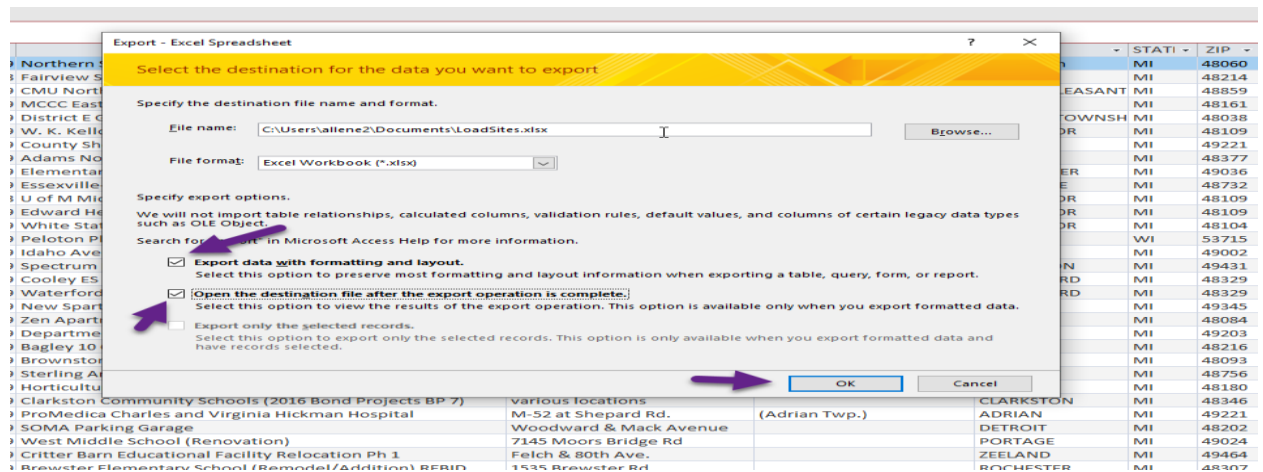
10. The file will now open in Excel after a few prompts.
11. While in Excel, right click on the Row box #2 and change the row height to 12.75.
12. Select all of the rows(click and hold and drag down to the bottom of the list. Let go of the mouse button and hit Control-Y. It will "redo" the same function, making all the rows 12.75.
13. Highlight the City Column, typically Column H. Then click Data, then A Z down. See below for example.

14. A window will pop up asking you to expand the selection. Select "Expand the selection" then click Sort. The list will now be sorted by City.
15. Highlight the County Column, typically Column K. Then click Data, then A Z down.
16. A window will pop up asking you to expand the selection. Select "Expand the selection" then click Sort. The list will now be sorted by City but also within the same county(ies)
17. Save the file to be distributed to field staff.
18. Save the file in the appropriate S Drive folder. For example: S:\bsrconsf\DODGE\2019
19. Save the Access file on the S Drive in the appropriate area. S:\bsrconsf\DodgeDB
20. Email the file to staff.